UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANOU LLC, JP SEARCH, INC. (f/k/a JANOU

PAKTER, INC.) and JANOU PAKTER,

-against-

16 Civ. 4288 (PAE)

Plaintiffs,

NOTICE OF MOTION FOR A JUDGMENT BY DEFAULT

JANOU PAKTER LLC,

Defendant.

PLEASE TAKE NOTICE that upon the Complaint; upon the Affidavit of Service of the Summons and Complaint; upon the Clerk's Certification of Default dated November 15, 2016; upon the Declaration of Janou Pakter in Support of Plaintiffs Janou LLC, JP Search, Inc. (f/k/a Janou Pakter, Inc.) and Janou Pakter's Motion for a Judgment by Default against Defendant Janou Pakter LLC dated February 3, 2017; and upon all prior proceedings herein, Plaintiffs Janou LLC, JP Search, Inc. (f/k/a Janou Pakter, Inc.) and Janou Pakter will move this Court, before The Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, in Courtroom 1305 at the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York, at a date and time to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 55(b)(2), for judgment by default against Defendant Janou Pakter LLC, and granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York February 3, 2017

Respectfully Submitted,

KERR, LLP

By: /s/ William B. Kerr William B. Kerr 44 Wall Street, 12th Floor New York, New York 10005 (212) 423-0305 (telephone) (646) 390-3992(fax)

Attorneys for Plaintiffs